

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

BUSINESS CASUAL HOLDINGS, LLC, a  
Delaware limited liability company,

Plaintiff,

v.

TV-NOVOSTI, a Russian autonomous non-  
profit organization,

Defendant.

Civil Action No. 21-cv-2007

**MOTION FOR WITHDRAWAL AS COUNSEL OF RECORD**

Pursuant to Local Civil Rule 1.4, the undersigned respectfully request the withdrawal of Gottlieb, Rackman & Reisman, P.C. (“GRR”) and Berliner Corcoran & Rowe LLP (“BCR”) as counsel of record for Defendant TV-Novosti. As demonstrated in the accompanying declarations of Marc P. Misthal and Laina C. Lopez, TV-Novosti has consented to the withdrawal of GRR and BCR. GRR respectfully requests that Marc P. Misthal and Shane Wax be removed as counsel of record for TV-Novosti, and BCR requests that Laina C. Lopez be removed as counsel of record for TV-Novosti.

TV-Novosti requests sixty (60) days in which to retain new counsel, and requests that the oral argument scheduled for 10 am on March 18, 2022 be adjourned to a date that is two (2) weeks after the deadline set by the court for TV-Novosti to retain new counsel.

Counsel for TV-Novosti contacted Plaintiff’s counsel on March 9, 2022 and asked if Plaintiff would consent to an “adjournment of oral argument to a date that is two weeks after the


deadline set by the court for TV-Novosti to retain new counsel.” Plaintiff’s counsel advised that Plaintiff “consent[s] to a two-week adjournment of oral argument in the above-captioned matter currently scheduled for March 18, 2022.”

Dated: New York, NY  
March 10, 2022

**GOTTLIEB, RACKMAN & REISMAN, P.C.**

By: /s/   
Marc P. Misthal ([mmisthal@grr.com](mailto:mmisthal@grr.com)) (MM6636)  
Shane Wax ([swax@grr.com](mailto:swax@grr.com)) (SW3247)  
270 Madison Avenue, 8<sup>th</sup> Floor  
New York, New York 10016  
Phone: (212) 684-3900  
Fax: (212) 684-3999  
*Counsel for Defendant TV-Novosti*

**BERLINER CORCORAN & ROWE LLP**

  
By : /s/  
Laina C. Lopez  
([lcl@bcr-dc.com](mailto:lcl@bcr-dc.com))  
1101 17th Street NW, Suite 1100  
Washington, DC 20036  
(202) 293-5555  
*Counsel for Defendant TV-Novosti*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion to Withdraw as Counsel of Record, together with the accompany Declarations of Marc P. Misthal and Laina C. Lopez, were served on March 10, 2022 to Counsel of Record for Plaintiff Business Casual Holdings, LLC, by e-mail addressed as follows:

Anderson Josiah Duff  
Hogan Duff, LLP  
43-10 Crescent St., Ste. 1217  
Long Island City, NY 11101  
[ajd@hoganduff.com](mailto:ajd@hoganduff.com)

Antigone Peyton  
Cloudigy Law PLLC  
8255 Greensboro Drive, STE C-130 Box 5  
Tysons Corner, VA 22102  
[a Peyton@cloudigylaw.com](mailto:a Peyton@cloudigylaw.com)

By: / s /   
Marc P. Misthal ([mmisthal@grr.com](mailto:mmisthal@grr.com)) (MM6636)  
270 Madison Avenue, 8<sup>th</sup> Floor  
New York, New York 10016  
Phone: (212) 684-3900  
Fax: (212) 684-3999  
*Counsel for Defendant TV-Novosti*